

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

LITTLETON EMMETT JACKSON,

Plaintiff,

v.

Case No. 21C0244

SIREENA PETERSON et al.,

Defendants.

DEFENDANTS' PROPOSED SPECIAL VERDICT

Defendants submit the attached proposed special verdict for use at trial in this matter.

Dated this 19th day of February, 2025.

Respectfully submitted,

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s/ Jeffery A. Simcox
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SPECIAL VERDICT FORM

Question 1: Did Plaintiff's headaches meet the standard of an objectively serious medical condition?

_____ (Yes or No)

If you answered "No" to Question 1, then STOP and do not answer any more questions. If you answered "Yes" to Question 1, then proceed to Question 2.

Question 2: On July 10, 2020, did Cameron Camacho fail to provide Plaintiff Littleton Jackson with medical care and attention, in violation of the Cruel and Unusual Punishments Clause of the Eighth Amendment of the United States Constitution?

_____ (Yes or No)

Proceed to question 3.

Question 3: On July 10, 2020, did James Hurst fail to provide Plaintiff Littleton Jackson with medical care and attention, in violation of the Cruel and

Unusual Punishments Clause of the Eighth Amendment of the United States Constitution?

_____ (Yes or No)

Proceed to question 4.

Question 4: On August 2, 2020, did Sireena Peterson fail to provide Plaintiff Littleton Jackson with medical care and attention, in violation of the Cruel and Unusual Punishments Clause of the Eighth Amendment of the United States Constitution?

_____ (Yes or No)

Proceed to question 5.

Question 5: On August 2, 2020, did David Greer fail to provide Plaintiff Littleton Jackson with medical care and attention, in violation of the Cruel and Unusual Punishments Clause of the Eighth Amendment of the United States Constitution?

_____ (Yes or No)

Proceed to question 6.

Question 6: On November 3, 2020, did Sireena Peterson fail to provide Plaintiff Littleton Jackson with medical care and attention, in violation of the Cruel and Unusual Punishments Clause of the Eighth Amendment of the United States Constitution?

_____ (Yes or No)

If you answered “Yes” to any of the questions 1-6. Proceed to question 7.

If you answered “No” to all of the questions in questions 1-6, do not answer any more questions.

Question 7: Did plaintiff suffer physical injury as a result of Defendants' actions or inactions?

_____ (Yes or No)

***If you answered “Yes” to question 7, proceed to question 8A.
If you answered “No” to question 7, proceed to question 8B.***

Question 8A: What sum of money will fairly and reasonably compensate Plaintiff for any resulting harm?

\$_____

Question 8B: Because you answered “No” to question 7, you must award Plaintiff one dollar (\$1.00) in nominal damages. Enter one dollar (\$1.00) in the blank below.

\$_____

Proceed to question 9.

Question 9: Is Plaintiff entitled to punitive damages against any Defendant?

_____ (Yes or No)

***If you answered “Yes” to question 9, proceed to question 10.
If you answered “No” to question 9, do not answer any more questions.***

Question 10: Which Defendant(s) do you find liable for punitive damages (circle either liable or not liable for each) and what sum of money do you award against each?

_____ (Yes or No)

Cameron Camacho	liable / not liable	\$_____
James Hurst	liable / not liable	\$_____
David Greer	liable / not liable	\$_____
Sireena Peterson	liable / not liable	\$_____

FOREPERSON: _____

DATE: _____